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August 2, 2001

VIA UPS OVERNIGHT DELIVERY

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Records Department – 1st Floor
200 Madison Street
Jefferson City, Missouri 65102

FILED

AUG 3 2001

**Missouri Public
Service Commission**

RE: Case No. TO-2000-374

Dear Judge Roberts:

Enclosed please find an original and nine (9) copies of Verizon Wireless' Motion to Late File a Reply and an original and nine (9) copies of Verizon Wireless' Comments Regarding the Office Of Public Counsel's Motion to Further Postpone Implementation Dates for the 314 NPA and 816 NPA Relief Plans to be filed in the above-referenced docket. Please file this Motion and these Comments in your usual manner and return the extra enclosed copy of each with the date of filing stamped thereon directly to the undersigned in the enclosed, self-addressed stamped envelope at your earliest convenience.

If you have any questions with respect to this filing, please contact me. Thank you for your assistance with and attention to this matter.

Very truly yours,

Thomas E. Pulliam

Thomas E. Pulliam

TEP\wh
Enclosures

cc: Counsel of Record (w/enclosure)
Anne Hoskins, Esq. (w/enclosure)

03100\C86

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

AUG 3 2001

In the Matter of the Petition of the North)
American Numbering Plan Administrator, on)
Behalf of the Missouri Telecommunications)
Industry, for Approval of NPA Relief)
Plan for the 314 and 816 Area Codes)

Missouri Public
Service Commission

Case No. TO-2000-374

MOTION TO LATE FILE REPLY

COMES NOW intervenor Verizon Wireless (formerly Ameritech CellularTM) and for its Motion to Late File a reply to the Motion of the Office of Public Counsel to Further Postpone Implementation Dates for 314 NPA and 816 NPA Relief Plans, hereby states as follows:

1. On or about July 23, 2001, the Office of Public Counsel ("OPC") filed its Motion to Further Postpone Implementation Dates For 314 NPA and 816 NPA Relief Plans, wherein OPC is seeking an order from this Commission further delaying the implementation dates of relief plans adopted by this Commission for the 314 NPA and the 816 NPA.
2. The undersigned counsel for applicant was out of his office on vacation when a copy of OPC's motion was delivered to the undersigned.
3. Upon the undersigned's return from vacation, the undersigned first became aware of OPC's Motion and notified Verizon Wireless of its filing. Thereafter, Verizon Wireless acted with due dispatch, diligence and speed to prepare its reply, filed contemporaneously herewith.
4. The Commision's Staff has filed a motion requesting an extension of the normal 10 day response period for pleadings to August 31, 2001 in light of a pending filing in this case at the end of this month, which such extension OPC has stated it does not object to (see Exhibit A, attached hereto and by this reference made a part hereof).

5. Pursuant to 4 CSR 240-2.080(16), parties may have more than 10 days to file a responsive pleading upon order of the Commission.

WHEREFORE, Verizon Wireless (formerly Ameritech CellularTM) hereby prays this Commission to enter its order allowing Verizon Wireless to late-file its Reply to the Motion of the Office of Public Counsel filed on July 23, 2001.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

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Attorneys for Intervenor Verizon Wireless

The undersigned hereby certifies that a true and correct copy of the foregoing Motion was sent by first-class U.S. mail, postage prepaid to the following parties on this 2nd day of August, 2001:

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August 1, 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Re: Case No. TO-2000-374

Dear Mr. Roberts:

This is to advise the Public Service Commission that the Office of the Public Counsel has no objection to Staff's motion for extension of time to August 31, 2001 to respond to Public Counsel's Motion to Postpone Implementation of Overlay NPAs for 314 and 816.

Thank you in advance for your cooperation and assistance.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Michael F. Dandino".

Michael F. Dandino
Senior Public Counsel

MFD:kh

cc: Judge Keith Thornburg
Counsel of Record

EXHIBIT A